

WRIGHT, FINLAY & ZAK, LLP  
Christina V. Miller, Esq.  
Nevada Bar No. 12448  
Krista J. Nielson, Esq.  
Nevada Bar No. 10698  
7785 W. Sahara Ave., Suite 200  
Las Vegas, Nevada 89117  
(702) 475-7964; Fax: (702) 946-1344  
[knielson@wrightlegal.net](mailto:knielson@wrightlegal.net)

*Attorneys for Plaintiff/Counter-Defendant, U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**U.S. BANK NATIONAL ASSOCIATION, AS  
TRUSTEE, FOR THE C-BASS MORTGAGE  
LOAN ASSET BACKED CERTIFICATES,  
SERIES 2006-CB4.**

Case No.: 2:17-cv-00493-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINE**

**(FOURTH REQUEST)**

**Plaintiff.**

vs.

PANDA LLC SERIES 6233 HALSTEAD;  
SHADOW SPRINGS COMMUNITY  
ASSOCIATION; RED ROCK FINANCIAL  
SERVICES.

#### Defendants.

PANDA LLC SERIES 6233 HAL STEAD

### **Counterclaimant**

VS

U.S. BANK NATIONAL ASSOCIATION, AS  
TRUSTEE, FOR THE C-BASS MORTGAGE  
LOAN ASSET BACKED CERTIFICATES,  
SERIES 2006-CB4

## Counter Defendant

**SHADOW SPRINGS COMMUNITY  
ASSOCIATION**

## Cross-Claimant

1 vs.  
2 RED ROCK FINANCIAL SERVICES,  
3  
4 Cross-Defendant.  
5 RED ROCK FINANCIAL SERVICES,  
6 Counter-Claimant,  
7 vs.  
8 SHADOW SPRINGS COMMUNITY  
9 ASSOCIATION,  
10 Counter-Defendant.

11 COMES NOW Plaintiff/Counter-Defendant, U.S. Bank National Association, as  
12 Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4 ("U.S.  
13 Bank"), Defendant/Counterclaimant, Panda LLC Series 6233 Halstead, Defendant/Counter-  
14 Claimant Red Rock Financial Services, and Defendant/Counter-Defendant, Shadow Springs  
15 Community Association ("Shadow Springs"), by and through undersigned and respective  
16 counsel of record, and hereby stipulate to extend the deadline for filing dispositive motions as  
17 follows:

18 LR 26-4 requires a stipulation to extend a deadline to be made no later than 21 days  
19 before the subject deadline and if made within 21 days of the deadline, it must be supported by a  
20 showing of good cause. This stipulation is within 21 days of the discovery deadline (April 30,  
21 2018). Good cause exists to extend the discovery deadline, namely to allow the parties  
22 additional time to discuss settlement without incurring the expenses of preparing dispositive  
23 motions.

24 IT IS HEREBY STIPULATED AND AGREED that the Parties shall have an extension  
25 of thirty (30) days, up to and until May 30, 2018, to file their respective Motions for Summary  
26 Judgment.

27 ///

28 ///

1           This is the parties' fourth request for extension of the dispositive motions deadline. This  
2 request is not intended to cause any delay or prejudice to any party.

3 DATED this 26<sup>th</sup> day of April, 2018.

4 WRIGHT, FINLAY & ZAK, LLP

5 */s/ Krista J. Nielson*

6 Christina V. Miller, Esq.

7 Nevada Bar No. 12448

8 Krista J. Nielson, Esq.

9 Nevada Bar No. 10698

10 7785 W. Sahara Ave., Suite 200

11 Las Vegas, NV 89117

12 *Attorneys for Plaintiff/Counter-Defendant,  
U.S. Bank National Association, as Trustee, for  
the C-BASS Mortgage Loan Asset Backed  
Certificates, Series 2006-CB4*

13 DATED this 26<sup>th</sup> day of April, 2018.

14 PENGILLY LAW FIRM

15 */s/ Elizabeth B. Lowell*

16 James W. Pengilly, Esq.

17 Nevada Bar No. 6085

18 Elizabeth B. Lowell, Esq.

19 Nevada Bar No. 8551

20 1995 Village Center Cir., Suite 190

21 Las Vegas, NV 89134

22 *Attorneys for Defendant/Cross-  
Claimant/Counter-Defendant, Shadow Springs  
Community Association*

DATED 26<sup>th</sup> day of April, 2018.

KOCH & SCOW LLC

*/s/ Steven B. Scow*

David R. Koch, Esq.

Nevada Bar No. 8830

Steven B. Scow, Esq.

Nevada Bar No. 9906

11500 South Eastern Avenue, Suite 210  
Henderson, NV 89052

*Attorneys for Defendant/Cross-  
Defendant/Counter-Defendant, Red Rock  
Financial Services*

DATED this 26<sup>th</sup> day of April, 2018.

AYON LAW, PLLC

*/s/ Luis A. Ayon*

Luis A. Ayon, Esq.

Nevada Bar No. 9752

Allison R. Schmidt, Esq.

Nevada Bar No. 10743

9205 West Russell Road

Building 3, Suite 240

Las Vegas, NV 89148

*Attorneys for Panda LLC Series 6233  
Halstead*

**ORDER**

IT IS SO ORDERED.

Dated this 8th day of May, 2018.

  
UNITED STATES MAGISTRATE JUDGE